

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HALLUM BAILEY and CAMPBELL SOUP
COMPANY,

Movants,

v.

GAMON PLUS, INC. and GAMON
INTERNATIONAL, INC.,

Respondents.

CASE NO. 1:24-CV-02877

JUDGE JOHN ROBERT BLAKEY

GAMON PLUS, INC. and GAMON
INTERNATIONAL, INC.,

Plaintiffs,

v.

CAMPBELL SOUP COMPANY, MEIJER, INC.,
THE KROGER CO., and TRINITY
MANUFACTURING, L.L.C.,

Defendants.

Underlying Action:

CASE NO. 1:15-CV-08940

JUDGE JOHN ROBERT BLAKEY
MAGISTRATE JUDGE YOUNG B. KIM

JURY TRIAL DEMANDED

**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL
PLAINTIFFS' OPPOSITION TO HALLUM BAILEY AND CAMPBELL SOUP
COMPANY'S MOTION TO QUASH THE SUBPOENA
ISSUED TO HALLUM BAILEY AND FOR A PROTECTIVE ORDER**

Pursuant to Local Rules 5.8 and 26.2, Plaintiffs, Gamon Plus, Inc. and Gamon International, Inc. (collectively, "Gamon"), respectfully move this Court for leave to file under seal their Opposition to Hallum Bailey and Defendant Campbell Soup Company's Motion to Quash the Subpoena Issued to Hallum Bailey Baily and for a Protective Order ("Opposition").

1. On October 14, 2016, this Court entered a Protective Order ("Protective Order") that is in effect in the underlying action. (Case No. 1:15-CV-08940, Dkt. 91.)

2. The Opposition quotes from and otherwise discloses information that Trinity Manufacturing, L.L.C. designated as Highly Confidential under the Protective Order in the underlying action.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that this Court grant them leave to file their Opposition under seal.

Dated: April 22, 2024

Respectfully submitted,

By: /s/ Kal K. Shah

Kal K. Shah

Mircea A. Tipescu

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*Attorneys for Gamon Plus, Inc. and
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CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2024 the foregoing document was filed via the Court's CM/ECF system, which will automatically serve and send email notification of such filing to all registered attorneys of record.

/s/ Kal K. Shah

*One of the attorneys for Gamon Plus, Inc. and
Gamon International, Inc.*